

FILED
COURT OF APPEALS
DIVISION II

06 OCT 19 PM 12:40

80755-8
COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON
BY AW
DEPUTY

STATE OF WASHINGTON,)

Respondent,)

No. 33981-1-II

v.)

TERRY WINTERSTEIN,)

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

RAP 10 10

Appellant.)

I, TERRY WINTERSTEIN, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

IN SUPPORT OF THE APPELLANT BRIEF PREPARED BY COUNSEL, SECTION B, ISSUES PERTAINING TO ASSIGNMENTS OF ERROR (III) THE TRIAL COURT ERRED WHEN IT DENIED MR. WINTERSTEIN'S MOTION FOR RELIEF FROM JUDGEMENT BECAUSE CCO RONGEN LACKED THE LEGAL AUTHORITY TO ENTER THE RESIDENCE AT 646 ENGLERT ROAD.

IN A SIMILAR CASE, STATE V. BRAMME, NO. 20856-7-III, WASH. APP. DIV. 3, 02; 2003, Id. AT 15-16-17, LYNN WEST, A COMMUNITY CORRECTION OF-

Additional Ground 2

FICER, TESTIFIED THAT DEPARTMENT OF CORRECTION ASSESSES EACH INCOMING OFFENDER AND ASSIGNS THEM A RISK AND NEEDS LEVEL OF A, MOST SERIOUS, B-C-D, LEAST SERIOUS.

MS. WEST TESTIFIED THAT DOC OFFENDERS IN THE C-D CATEGORIES RECEIVE NO FACE TO FACE SUPERVISION ONCE THEY ARE RELEASED FROM AN INSTITUTION AND HAVE RECEIVED THEIR INITIAL INTAKE. THEY WOULD BE SUPERVISED BY KIOSK MACHINES. THEY WOULD BE RE-

Additional Ground 3

REQUIRED TO COME IN AND REPORT TO A MACHINE ONCE A MONTH, AND
KEEP A CURRENT ADDRESS POSTED WITH THE DEPARTMENT OF CORREC-
TIONS. SEE STATE V. BRAMME, NO. 20856-7-III (WASH. APP. DIV. 3, 02/25/
2003) [15], [16], [17].

CLEARLY, MR. WINTERSTEIN REQUIRED NO FACE TO FACE CONTACT WITH
CCO RONGEN.

MR. WINTERSTEIN'S CURRENT DOC CRIME CATEGORY, DATED 11/23/2005,

Additional Ground 4

SECTION I. STATES, DOC CRIME CATEGORY D WITH A RELEVANT SCORE
OF 20 FOR CLASSIFICATION PURPOSES WITHIN THE DOC.

CERTIFICATE OF MAILING

I certify that I mailed

1 copies of SAG
brief to S. Bauer
* 10/23/06 JW
Date Signed

If there are additional grounds, a brief summary is attached to this statement.

Date: 10-17-6

Signature: Terry Winterstein

06 OCT 19 PM 12:40

CERTIFICATE OF SERVICE BY MAIL

STATE OF WASHINGTON

This is to certify and state under the penalty of perjury under the laws of the State of ^{BY} DEPUTY
Washington that I have mailed a true and correct copy of the following document(s):

STATEMENT OF ADDITIONAL GROUNDS

By depositing in the United States mail, marked *Legal Mail*, postage prepaid, on
this 17 day of OCT., 2006 to the following:

DAVID RONZOKA CLERK
Court of Appeals DIV II
950 Broadway Suite 300
TACOMA, WA. 98402

ANNE M. CRUSER
P.O. BOX 1670
KALAMA, WA.

98526

Respectfully Submitted,

Terry Winterstein
Signature

TERIE WINTERSTEIN

Printed/Typed Name

D.O.C.# 243320 Unit # H3A Cell # 100

Stafford Creek Corrections Center

191 Constantine Way

Aberdeen, WA 98520